

Serial No. 10/758,844
Attorney Docket No. 87159200.242005

REMARKS / ARGUMENTS

This Amendment and Response to Office Action is filed in response to the Office Action of June 9, 2005. Presently, claims 1-8, 12-16 and 19-20 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,104,454 issued to Hiyama et al. ("Hiyama et al." hereafter). Claims 1, 9-10, 12 and 17 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,257,726 issued to Okuyama ("Okuyama" hereafter). In addition, claims 11 and 18 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Hiyama et al. These rejections set forth in the outstanding Office Action are overcome for at least the reasons stated below.

I. Rejection of Claims 1-8, 12-16 and 19-20 as Being Anticipated by Hiyama et al.

Claims 1-8, 12-16 and 19-20 stand rejected under 35 U.S.C. §102(b) as being anticipated by Hiyama et al. The Applicants have cancelled claims 19-20 without disclaimer of their subject matter by way of the amendment herein, and respectfully traverse this rejection with respect to claims 1-8 and 12-16.

Amended claims 1 and 12 recite, *inter alia*, at least one light-diffusing layer coupled to the plurality of converter units and configured to scatter light outputted from the plurality of converter units in a direction substantially perpendicular to the light-diffusing layer. The Applicants submit that Hiyama et al. fails to disclose or even suggest the claimed invention, as set forth in amended claims 1 and 12.

In contrast, in Hiyama et al., a prism sheet array 240 with vertex angle 242 is coupled to the waveguide/polarizing means 230, which is configured to convert all the input light to S-polarized light. Because the S-polarized light emerges from the waveguide/polarizing means 230 inclined at about 26 degrees, the coupling of the prism sheet array 240 to the

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waveguide/polarizing means 230 is necessary to turn the inclined S-polarized light to a direction perpendicular to the liquid crystal display element 250. See col. 11, lines 32-39: "*a prism sheet array with a vertex angle 242 of 51 degrees is provided on the light emerging side of the waveguide/polarizing means 230 in order to make the exiting light incident substantially perpendicularly to a liquid crystal display element 250.*" Therefore, Hiyama et al. fails to teach or even suggest the claimed invention in which at least one light-diffusing layer is coupled to the plurality of converter units and is configured to scatter light outputted from the plurality of converter units in a direction substantially perpendicular to the light-diffusing layer.

For at least the foregoing reasons, the Applicants believe that claims 1 and 12 patently distinguish from Hiyama et al. By virtue of their respective dependency on claims 1 and 12, dependent claims 2-8 and 13-16 should also patently distinguish over Hiyama et al. Withdrawal of the rejection to these claims thus is respectfully requested.

II. Rejection of Claims 1, 9-10, 12 and 17 as Being Anticipated by Okuyama

Claims 1, 9-10, 12 and 17 stand rejected under 35 U.S.C. §102(b) as being anticipated by Okuyama. The Applicants respectfully traverse this rejection.

The Applicants submit that Okuyama fails to teach or even suggest a system in which at least one light-diffusing layer is coupled to the plurality of converter units and configured to scatter light outputted from the plurality of converter units in a direction substantially perpendicular to the light-diffusing layer, as claims 1 and 12 require.

In contrast, Okuyama teaches a projector system in which condensing lenses 8, 9 must be coupled to the polarization converting element array 7 to combine emerging light beams together on the image display element 10. See FIG. 2; col. 4, lines 64-67: "*The plurality of light beams*

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from the polarized light converting element array 7 are combined together on the image display element 10 by the condensing lens 8 and the condenser lens 9." Okuyama thus neither teaches nor suggests coupling at least one light-diffusing layer to the plurality of converter units, as claims 1 and 12 requires.

For at least the foregoing reasons, it is submitted that claims 1 and 12 patently distinguish from Okuyama. By virtue of their respective dependency on claims 1 and 12, dependent claims 9, 10 and 17 should also patently define over Okuyama. Withdrawal of the rejection thus is respectfully requested.

III. Rejection of Claims 11 and 18 as Being Unpatentable Over Hiyama

Claims 11 and 18 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Hiyama et al., because the cited reference allegedly teaches coupling a light-diffusing layer to the plurality of converter units as recited in claims 11 and 18. The Applicants respectfully traverse this rejection.

As discussed above, Hiyama requires coupling a prism sheet array 240 to the polarizing element 230 so as to turn the diagonally inclined direction of light emerging from the polarizing element to a direction normal to the display element. In Hiyama, the light emerging from the polarizing element thus is not in a perpendicular direction, and no light-diffusing layer is coupled to the polarizing element so as to scatter light emerging from the polarizing element in a perpendicular direction to the light-diffusing layer.

For at least the foregoing reasons, it is submitted that claims 1 and 12, which include the features recited in canceled claims 11 and 18, patently distinguish from Hiyama et al. Withdrawal of the obviousness rejection thus is respectfully requested.


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CONCLUSION

For at least the foregoing reasons, it is believed that all of pending claims 1-10 and 12-17 of the present application patently define over the prior art and are in proper condition for allowance. If Examiner believes that a telephone conference would expedite the examination of the above-identified patent application, Examiner is invited to call the undersigned. Because this filing is submitted within the three-month deadline, no Petition for Extension of Time is required. The Commissioner is hereby authorized to charge any deficiencies, or credit any overpayment, to Account No. 13-0480, Attorney Docket No. 87159200.242005 to complete this filing.

If Examiner has any questions regarding this filing or the application in general, Examiner is invited to contact Applicant's attorney at the below-listed address.

Respectfully submitted,


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